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and 21st CENTURY INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD STALLONE, on behalf of himself
and all other persons similarly situated,

Plaintiff,

v.

FARMERS GROUP, INC., a Nevada
Corporation; FARMERS INSURANCE
EXCHANGE; and 21st CENTURY
INSURANCE COMPANY,

Defendants.

Case No. 2:21-cv-01659-GMN-VCF

**STIPULATION AND [PROPOSED]
ORDER TO STAY ALL DEADLINES TO
FINALIZE SETTLEMENT**

STIPULATION AND [PROPOSED]
ORDER TO STAY ALL DEADLINES
TO FINALIZE SETTLEMENT

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1 Plaintiff Ronald Stallone (“Plaintiff”) and Defendants Farmers Group, Inc., Farmers
 2 Insurance Exchange, and 21st Century Insurance Company (“Defendants”) (collectively, the
 3 “Parties”) stipulate and agree as follows and respectfully request the Court enter an order consistent
 4 with the following:

5 1. On September 8, 2021, Plaintiff filed his Complaint (ECF No. 1) against Farmers
 6 Group, Inc., Farmers Insurance Exchange, and Truck Insurance Exchange. On January 7, 2022,
 7 Plaintiff filed his Amended Complaint, adding 21st Century Insurance Company as a defendant
 8 and removing Truck Insurance Exchange (ECF No. 16). On October 26, 2022, Plaintiff filed his
 9 Second Amended Complaint (ECF No. 58).

10 2. On November 14, 2022, the Court issued its Scheduling Order pursuant to Federal
 11 Rule 16(b) and Local Rule 16-1 (ECF No. 64). On September 14, 2023, the Court granted the
 12 Parties’ Stipulation for Extension of Case Deadlines, which set various deadlines regarding expert
 13 disclosures, the cutoff for discovery, and dispositive and class certification motions (ECF No. 76).

14 3. The Parties have reached an agreement resolving this matter and are in the process
 15 of drafting a settlement agreement as between Plaintiff Stallone and Defendants.

16 4. Accordingly, to conserve the Parties’ and the Court’s resources, to promote judicial
 17 economy, and to allow the Parties to finalize the resolution of this matter, the Parties respectfully
 18 request that the Court stay all deadlines, including the deadlines set forth in Court’s Order granting
 19 the Parties’ Stipulation for Extension of Case Deadlines (ECF No. 76), for 30 days to allow the
 20 Parties to finalize a formal settlement agreement and file a dismissal.

21 5. Subject to the Court’s approval, to the extent the Parties do not finalize a formal
 22 settlement agreement within 30 days, the Parties propose they file a status report within 30 days
 23 of the date of this order, which will address the status of the Parties’ negotiations and potential
 24 adjustments to the case schedule, including an amended proposed discovery plan and scheduling
 25 order.
 26

6. By entering into this stipulation, the Parties hereto do not waive, and expressly preserve, all rights, remedies, and defenses.

Respectfully submitted this 5th day of April, 2024.

KIND LAW FIRM

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By: /s/ Kate M. Baxter-Kauf

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IT IS SO ORDERED.

April 6, 2024


U.S. DISTRICT COURT JUDGE